



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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Applicant : Gyozo Baki Confirmation No.: 3031  
Serial No. : 09/744,035  
Filed : April 20, 2001  
TC/A.U. : 3753  
Examiner : J. C. Fox

Docket No. : 01-117  
Customer No. : 34704

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313

REQUEST FOR RECONSIDERATION

Sir:

In response to the Office action dated January 11, 2006  
having a shortened statutory period for response set to expire  
April 11, 2006, please amend the above-identified application as  
follows.

**Remarks/Arguments** begin on Page 2 of this paper.

**REMARKS/ARGUMENTS**

Applicant respectfully requests the examiner to reconsider his rejection and to specifically address the arguments presented in Applicant's last filed amendment which are repeated hereinbelow.

Applicant has added new claims 8-10. Claims 8-10 set forth with specificity that the valve battery cartridge includes different interchangeable insertion pieces which are selectively used for changing the function of the valve battery cartridge. The difference between the cited reference and the invention as claimed in claims 8, 9 and 10 as well as currently pending claims 5-7 is the universal character of the valve battery cartridge of the present invention. The insertion piece of the valve battery cartridge of the present invention can be used for several purposes while the solution of the cited U.S. patent can only be used for one purpose, namely, for reverting the hot and cold water inlets. The examiner's attention is drawn to Figures 4, 5, 6 and 7 of the instant application as well as the description set forth in the instant specification relative to those Figures. The advantages of the present invention is that when ordering the valve battery cartridge of the present invention the kind of insertion piece may also be given. Without this insertion piece the valve battery cartridge cannot be operated. However, in accordance with the present invention, there is the possibility to order a plurality of different types of insertion pieces in case you want to use the battery cartridge for different functions with the different insertion pieces. Figure 4 shows the basic type of cartridge. Figure 5 the standard insertion piece. Figure 6 the pressure equalizer insertion and Figure 7 the reverting insertion.

A further difference between the cited reference and the present invention lies in the fact that the insertion piece according to the invention can be replaced without disassembling the main operating elements. According to the cited reference, the whole cartridge has to be disassembled when replacing an insertion piece for reassembling the cartridge an expert is needed and a further disadvantage of the reassembling lies in the fact that sealing of the

cartridge cannot be made when reconstructed. The device of the prior art is not meant to be disassembled and reassembled using different insertion pieces which provide different functions. This particular feature of the present invention is not at all disclosed nor rendered obvious by the prior art.

The examining attorney in this most recent office action has not addressed any of the arguments concerning the universal character of the valve battery cartridge in the present invention. The examiner has failed to indicate where the prior art teaches a valve battery cartridge having a "universal character" which allows the valve battery cartridge to be used for several purposes without the need of the entire cartridge to be disassembled. Applicant has presented specific advantages obtained by the valve battery cartridge of the present invention. These advantages and functions are not suggested by the sum total teachings of the prior art references.

The examiner fails to indicate with respect to independent claim 5 where there is a teaching in the prior art references for the following:

"... wherein the connection element (14) and the base (9) of the cartridge casing (3) receives the interchangeable insertion piece (10) which enables connection between connection ducts (13) in a valve battery body (12)..." (emphasis added)

There is nothing in the prior art references to suggest an interchangeable insertion piece.

With regard to independent claim 6, the examiner fails to point out where the prior art teaches the following:

"...a replaceable insert (10) being arranged in a sealed manner in the connecting element (14)... the inlet apertures are sealed from one another by the replaceable insert" (emphasis added)

With regard to independent claim 8, the examiner fails to specifically point out the teachings for the following:

"...the base (9) of the cartridge casing (3) is formed with a connection element (14) for selectively receiving different interchangeable insertion pieces (10)... wherein the connection element (14) in the base (9) of the cartridge casing (3) receives a selected interchangeable insertion piece (10)..." (emphasis added)

With regard to independent claim 9, the examiner fails to specifically point out where the prior art teaches the following limitation:

"...a selectively replaceable insertion piece... the inlet apertures are sealed from one another by the insertion replaceable insert, wherein the selected replaceable insert comprises an insert selected from a plurality of inserts of different functions which are interchangeable with the connecting element to provide different functions for the battery cartridge..."

In summary, the examiner in his last office action fails to address the specific limitations in the claims which form the arguments previously presented and which are herein again presented for the examiner's consideration. It is submitted that the examiner's previous office action was incomplete in that it did not address any of the arguments specifically presented nor the individual claim limitations referred to above as set forth in the claims.

It is submitted that all of the claims as presently pending patentably define over the art of record and an early indication of same is respectfully requested.

An earnest and thorough attempt has been made by the undersigned to resolve the outstanding issues in this case and place same in condition for allowance. If the Examiner has any questions or feels that a telephone or personal interview would be helpful in resolving any outstanding issues which remain in this application after consideration of this amendment, the Examiner is courteously invited to telephone the undersigned and the same would be gratefully appreciated.

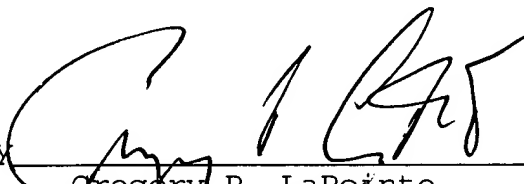
It is submitted that the claims as amended herein patentably define over the art relied on by the Examiner and early allowance of same is courteously solicited.

If any fees are required in connection with this case, it is respectfully requested that they be charged to Deposit Account No. 02-0184.

Respectfully submitted,

Gyozo Baki

By



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Date: April 5, 2006

I, Rachel Piscitelli, hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313" on April 5, 2006.

